Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
Public Safety and Homeland Security Bureau Seeks Comment on Notice of Proposed Rulemaking in the 700 MHz Public Safety Narrowband	)	PS Docket No. 13-87

COMMENTS OF:
THE CALIFORNIA PUBLIC-SAFETY RADIO ASSOCIATION

The California Public-Safety Radio Association (CPRA) submits these comments to the Commission's Public Notice in the above-captioned proceeding concerning options for the 700 MHz Public Safety Narrowband spectrum.

The California Public Safety Radio Association

The California Public Safety Radio Association is the Southern California Chapter of the Association of Public-Safety Communications Officials International (APCO). CPRA represents the people who manage, operate, maintain and supply the communications systems used to safeguard the lives and property of citizens throughout the Los Angeles Urbanized Area. Among the CPRA ranks are over 400 professionals representing the Police, Fire, EMS, Forestry, Highway and Conservation radio user groups.

CPRA membership is from the 10 Southern California Counties: San Luis Obispo, Kern, Santa Barbara, Ventura, Los Angeles, San Bernardino, Riverside, Orange, San Diego and Imperial.

CPRA members represent public safety agencies that utilize now, or plan to utilize the 700 MHz Narrowband spectrum for their mission critical voice communications.

CPRA Comments

FCC 13-40 – Item 76:

CPRA believes the Commission should eliminate the December 31, 2016 requirement to vacate 12.5 khz channel efficiency in favor of 6.25 khz efficiency. CPRA feels that Public Safety licensees are best served when they retain the option to choose the most appropriate bandwidth to meet their operational communications needs and integrate best with their radio system architecture. The increase in spectral efficiency provided by a transition to 6.25 khz equipment should be left as a "when and where needed" option for existing and prospective licensees to implement in consultation with their local 700 MHz Regional Planning Committee. Accordingly, let the natural progression materialize for respective agency evolution to 6.25 khz channel efficiency.

FCC 13-40 – Item 86:

CPRA agrees with the assertion made by Louisiana in their July 2012 Waiver Request[1] that correctly noted the lifecycle of 700 MHz equipment will be drastically shortened if the December 2016 date is enforced. In Southern California, under the rules and regulations set forth in the 800 MHz Rebanding program, many agencies utilized the Transition Administrator's Subscriber Early Deployment program which replaced 800 MHz subscriber radios with 700/800 MHz equipment that is not capable of 6.25 khz operation. In other activities, Urban Area Security Initiative (UASI) programs in Southern California have distributed federal monies to purchase 700 MHz infrastructure and subscriber equipment that is only capable of 12.5 khz efficiency. The result is multiple thousands of subscriber radio units and tens of millions of dollars of infrastructure equipment recently deployed in the Southern California area through the Commission's 800 MHz Rebanding Project and

[1] State of Louisiana Request for Waiver of the December 16, 2016 700 MHz Narrowbanding Deadline.

through UASI funding will not be permitted to be utilized on the 700 MHz Narrowband if the December 31, 2016 migration deadline is left to stand. It is not reasonable to expect local agencies to fund, even if money was readily available, the replacement of otherwise new 700 MHz radio equipment to meet a 6.25 khz bandwidth compliance requirement.

In the philosophical sense, CPRA believes the FCC should ultimately consider long term management of the 700 MHz Narrowband emission bandwidth using the same thought process as 800 MHz bandwidth management. Most public safety radios available for sale today that have 700 MHz capability also have 800 MHz capability as well. Radio system RF equipment like base stations and logical processing infrastructure such as trunking controllers, provide a similar capability in that they can serve both the 700 and 800 MHz spectrum in one piece of equipment. Modern trunked radio systems are being built with 700 and 800 MHz frequency resources in the same system or cell without technical limitation. Several agencies in Southern California are utilizing 700 MHz narrowband channel pairs to augment their 800 MHz trunked frequency resources. A compelling argument emerges that the 700 MHz Narrowband Spectrum should not be any more or less restrictive, bandwidth wise, than the 800 MHz spectrum that it is being deployed to augment.

FCC 13-40 – Item 118:

CPRA recommends permanent allocation of the 48 Reserve Spectrum channels for fixed, portable, and interoperability trunking capability managed by the 700 MHz Regional Planning Committee. Consequently, CPRA does lend its support to the request for waiver filed by LA RICS[2] to utilize the 700 MHz Narrowband reserve channels in the Los Angeles area. The pending loss of T-Band in the Los Angeles Urbanized Area necessitates the need for LA RICS to utilize 700 MHz radio spectrum to insure critical, life safety communications have a home after T-Band licensees are cancelled. The daily operational needs of LA RICS, as its member agencies provide law enforcement, fire protection, emergency medical and general governmental services throughout the Los Angeles region using resources from the

[2] LA RICS Request for Waiver of Section 90.531(b)(2) filed December 7, 2012.

Reserve Assignment must take a higher priority than the provision for portable trunking systems currently authorized in the Reserve Assignments.

FCC 13-40 – Item 124:

CPRA believes that any working incident involving first responders will heavily utilize portable radios in the direct mode, and as the incident expands, potentially in the repeat mode as well. Portable and mobile radios in the 700 MHz band are usually rated for 3 watts and 35 watts TPO, respectively. Mobile radios utilized on scene at an incident can be expected to service command and control communications, and thus transmit high priority "must be heard" communications from incident commanders to the responders at large. Mobile radios in the direct mode of operation need a higher level of power to improve the likelihood that transmissions are heard inside of buildings or other areas where high levels of radio signal attenuation or absorption may be encountered. CPRA agrees with NPSTC's proposal[3] to establish a 20 watt ERP on the Low Power Channels.

CPRA does not believe an increased ERP will necessarily result in harmful interference. Regional coordination efforts starting at the 700 MHz Regional Planning Committees and working through the SEIC and ultimately extending into the Public Safety Dispatch Centers can establish local policy and best practice standards which will insure that the coordination of Low Power Channel usage is implemented on a real time basis. Such real time coordination will insure that Low Power Channels are not assigned to incidents in close proximity to each other, thus reducing the chance of interference.

FCC 13-40 – Item 138:

CPRA also agrees with the Commission's tentative conclusion that ERP, and not TPO limits, be utilized to describe transmit power limitations in Section 90.541.

Closing Comments:

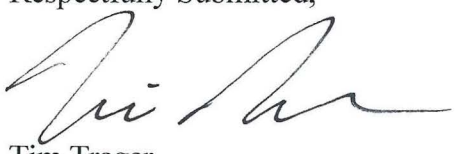
CPRA applauds the Federal Communications Commission's proposed rulemaking in the 700 MHz Narrowband Spectrum. CPRA's membership includes agencies that are heavily

[3] 2008 NPSTC Petition to the FCC.

involved in planning for their future 700 MHz Narrowband operations. Other CPRA member agencies currently utilize the 700 MHz Narrowband Spectrum to meet their daily emergency communications needs. A stable 700 MHz Narrowband regulatory environment is critical not only in the Southern California region, but throughout the nation as a whole. In Southern California, a vast amount of professional resource, local capital, and monies from Federal Assistance programs has been expended on 12.5 khz equipment in the few short years that the 700 MHz Narrowband Spectrum has been a resource available to the public safety community.

As more agencies become increasingly dependent on the 700 MHz Narrowband Spectrum, time is of the essence in defining the future of the 700 MHz narrowband. The Southern California Public Safety Community as a whole needs to have lingering questions answered. The Commission can provide answers in the form of timely rulemaking so that agencies can have the assurance and peace of mind that their 700 MHz Narrowband Spectrum existing and planned investments will meet their operational needs and will realize a full lifecycle of service.

Respectfully Submitted,



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